

FILED
FORM TO BE USED BY A PRISONER IN
FILING A CIVIL RIGHTS COMPLAINT

IN THE UNITED STATES DISTRICT COURT
FOR THE
NORTHERN DISTRICT OF OHIO

U.S. DISTRICT COURT
NORTHERN DISTRICT OF OHIO
CLEVELAND

1:18 CV 2374
CIVIL CASE NO.

JUDGE OLIVER
JUDGE

COMPLAINT

Zachary Napoleon Scruggs
(Enter above the full name of the plaintiff in this action)

VS.

Clifford Pinkey (Sheriff)

Kenneth M. M. S. Director of Regional Correction

Cuyahoga County Sheriff

(Enter above the full name of the defendant(s) in this action)

I. Previous Lawsuits

A. Have you begun other lawsuits in state or federal court dealing with the same facts involved in this action or otherwise relating to your imprisonment? YES ☐ NO ☒

B. If your answer to A is yes, describe the lawsuit in the space below, (If there is more than one lawsuit, describe the additional lawsuits on another piece of paper, using the same outline).

1. Parties to this previous lawsuit

Plaintiffs _____

Defendants _____

2. Court (if federal court, name the district; if state court, name the county)

3. Docket Number _____

4. Name of judge to whom case was assigned _____

-2-

5. Disposition (for example: Was the case dismissed? Was it appealed? Is it still pending?)

6. Approximate date of filing lawsuit

7. Approximate date of disposition

II. Place of Present Confinement

A. Is there a prisoner grievance procedure in this institution? YES ☒ NO ☐

B. Did you present the facts relating to your complaint in the state prisoner grievance procedure?

YES ☒ NO ☐

C. If your answer is YES,

1. What steps did you take? I've Complaint to the Jail about everything

Im telling You'll

2. What was the result? No one answered

D. If your answer is NO, explain why not

E. If there is no prison grievance procedure in the institution, did you complain to prison authorities?

YES ☒ NO ☐

F. If your answer is YES,

1. What steps did you take? The Bureau of Adult Detention 770 West Broad

Columbus 43222, Chief Inspector 770 West Broad 43222

2. What was the result? Nothing at all that I know about at this

time

- 3 -

III. Parties

(In item A below, place your name in the first blank and place your present address in the second blank. Do the same for additional plaintiffs, if any).

A. Name of the Plaintiff Zachary Napoleon Scruggs

Address Po Box 56000 Cleveland, Ohio 44101

(In item B below, place the full name of the defendant in the first blank, his or her official position in the second blank, and his or her place of employment in the third blank. Use item C for the names, positions and places of employment of any additional defendants).

B. Defendant Clifford Pinkas, Kenneth Mills, Cuyahoga County Sheriff is employed as

Cuyahoga County Sheriff at 1200 Ontario Street Cleveland, Ohio 44113

C. Additional Defendants _____

IV. Statement of Claim

(State here as briefly as possible the facts of your case. Describe how each defendant is involved. Include also the names of other persons involved, dates and places. Do not give any legal arguments or cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separated paragraph. Use as much space as you need. (Attach extra sheet(s) if necessary).

To Whom this may concern, My name is Zachary Napoleon Scruggs. This is my grievance to Cuyahoga County Sheriff address 1215 West Third Street, Cleveland, Ohio 44113. I've been in Cuyahoga County Jail since March 9, 2018, my inmate number is 0296706. I'm writing this because all of my rights have been violated not once, but multiple times. I'm getting put into my assigned cell every morning from 9:30 am, until 7:30 pm everyday and being told that I cannot use the phone to contact my Attorney when need to be. But, even then there's no way a person in here (jail), can get in touch with their attorney at 7:30 pm. The rule book states we have

- 4 -

(Statement of Claim Continued)

access to the phones from 7:00am to 10pm, except when it's a razor night which are Tues, Thurs, and Sunday nights. Why haven't this been carried out? There is nothing in the inmates handbook about "Red Zone". What is Red Zone, that they can lock a person down all day just because? Then that's not all. I have to shower everyday in "Blackmold." Blackmold cause's heart and breathing problems. So why am I being subject to blackmold that kills slowly. Even the food trays are filthy, coming back from the kitchen with old food along with smelly sewer water smells from not being properly cleaned and stored. That's not all. I've asked many times about the use of the law research center/library. And was told "no" because I don't have A 1983 claim. How would I better understand my charges and all that I'm in here for? These attorney's are over worked and under paid. So since, I cannot afford A paid attorney, I am forced to accept a unwanted plea deal since I'm denied proper research of my own case for my defense? By all these things taking place inside this facility you are taking away my due process. There's no where in the handbook saying I would be subject to any of these things. I can't even get the right Health Care because they are over crowded with an additional 1,000 inmate. There's not even A social worker here to take about special needs, how can you run a place like this without one? In ending this facility needs help and structure. It also needs Officer's who know how to treat people, we still are people, innocent until proven guilty. Each American citizen is to be given that right of respect.

Sincerely,

Zachary N. Scruggs
SO#0296726

P.O. Box 5600
Cleveland, OH 44101

- 5 -

V. Relief

(State briefly exactly what you want the court to do for you. Make no legal arguments. Cite no cases or statutes).

I would like the courts to help me in this matter so I can get the proper help in my case while incarcerated. Making this facility safer and cleaner for each inmate. Make it possible that each inmate while here will be able to get the full support of the county. Me as well as each inmate are being treated like animal, but even animal get more help and support as us. I feel there are all tactics for people to just quit and cope-out. And that isn't right. People are fighting real case for their lives to be able to one day see hear and be with their loved ones. The same things people that are free would only demand.

Signed this 9th day of October, 2018.

I declare under penalty of perjury that the foregoing is true and correct.

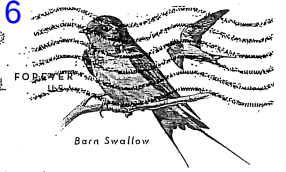
10/9/18
(Date)

Anthony N. Scungis
(Signature of Plaintiff)

Zachary N. Scroggs #0296736
P.O. Box 5600
Cleveland, OH 44101

CLEVELAND OH 44101

OCT 20 2018



Clerks Office
801 West Superior Ave
Cleveland, OH 44113

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Clerk of Courts
U.S. District Court, N.D.O.

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